April 22, 2024

VIA ECF

The Honorable Valerie E. Caproni United States District Judge United States Courthouse 40 Foley Square New York, NY 10007

Re: Drew Dixon v. Antonio Marquis "L.A." Reid, 1:23-cv-09878-VEC

Dear Judge Caproni:

The parties in this matter, Plaintiff Drew Dixon and Defendant Antonio Marquis "L.A." Reid, respectfully submit for the Court's consideration proposed versions of the Protective Order. Plaintiff's proposed version is attached as Exhibit A; Defendant's proposed version is attached as Exhibit B. While the parties have had extensive discussion and conferral regarding the areas of dispute, the parties were unable to agree on the bolded language in each proposed version of the Protective Order.

Respectfully submitted,

/s/ Kenya K. Davis

Kenya K. Davis (NY Bar #4162483) Boies Schiller Flexner LLP 1401 New York Ave., NW Washington, DC 20005 (202) 237-9608 kdavis@bsfllp.com

Sigrid S. McCawley (NY Bar # 6051460) Daniel J. Crispino (*pro hac vice*) Boies Schiller Flexner LLP 401 E. Las Olas Blvd., Suite 1200 (954) 356-0011 smccawley@bsfllp.com dcrispino@bsfllp.com

Counsel for Plaintiff Drew Dixon

/s/ Bobbi C. Sternheim

Bobbi C. Sternheim (NY Bar #1733625) Law Offices of Bobbi C. Sternheim 225 Broadway – Suite 715 New York, NY 10007 (212) 243-1100 bcsternheim@mac.com

Shawn Holley (pro hac vice)
Kate E. Mangels (pro hac vice)
Suann Caulfield MacIsaac (pro hac vice)
Kinsella Holley Iser Kump Steinsapir LLP
11766 Wilshire Boulevard, Suite 750
Los Angeles, CA 90025
(310) 566-9822
sholley@khiks.com
kmangels@khiks.com
smacisaac@khiks.com

Counsel for Defendant Antonio Marquis "L.A." Reid